

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JOHN DOE,
Plaintiff

v.

WILLIAMS COLLEGE,
Defendant

Civil Action No. 3:16-CV-30184

DECLARATION OF ELIZABETH H. KELLY

I, Elizabeth H. Kelly, hereby declare and state as follows:

1. I am an attorney admitted to practice in the Commonwealth of Massachusetts and to the United States District Court for the District of Massachusetts.

2. I am one of the attorneys representing the defendant Williams College in this case.

3. The documents attached to the Defendant's Response to Plaintiff's Statement of Material Facts are true and correct copies of the following materials, with redactions and the parties' names replaced with pseudonyms:

Ex. 167 November 7, 2017 letter from Attorney Lapp to Attorney Rossi

Ex. 168 Document produced by Defendant, bates labeled WMS00394-WMS00395

Ex. 169 Document produced by Defendant, bates labeled WMS07071-WMS07073

Ex. 170 Document produced by Defendant, bates labeled WMS07068-WMS07070

Ex. 171 Select slides from the document that is Plaintiff's Exhibit 66

Signed under the pains and penalties of perjury this 29th Day of October, 2018.

/s/ Elizabeth H. Kelly

Elizabeth H. Kelly (BBO No. 672277)

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